



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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January 30, 2024

**VIA ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Paul Phillips, et. al. v. The City of New York, et. al., 21 Civ. 8149  
(ALC)(SLC)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing the appearing defendants in the above referenced matter. I write with the consent of plaintiffs' counsel to respectfully propose the following briefing schedule on plaintiffs' renewed motion to strike defendants' motion to dismiss. (See Docket 151): 1) defendants' response-2/23/24; plaintiffs' reply-3/15/24.

The parties respectfully request that the Court so-order the foregoing briefing schedule.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman  
Mark D. Zuckerman

cc: All counsel (via ECF)